

FILED

2024 MAR -1 AM 10:16

U.S. DISTRICT COURT  
MIDDLE DISTRICT OF TN

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

## UNITED STATES DISTRICT COURT

for the

MIDDLE District of TENNESSEE

Division

GRACE TEMISAN EKPERIGIN

Case No.

(to be filled in by the Clerk's Office)

## Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

VANDERBILT UNIVERSITY, NEIL E.  
JAMERSON, JOHN & JANE DOE (being  
persons unknown to Plaintiff)

## Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT AND REQUEST FOR INJUNCTION

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name GRACE TEMISAN EKPERIGIN

Street Address 401 BROOKSIDE CT

City and County NEWTOWN

State and Zip Code CT 06470

Telephone Number (914) 645-0249

E-mail Address		GRACE.T.EKPERIGIN@VANDERBILT.EDU;
<b>B. The Defendant(s)</b>  Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.		
Defendant No. 1		
Name		VANDERBILT UNIVERSITY
known)	Job or Title (if	DEPT. OF COMMUNITY STANDARDS & SUPPORT ADMIN.
Street Address		2302 VANDERBILT PLACE, SUITE 310
City and County		NASHVILLE
State and Zip Code		TN 37240
Telephone Number		(615) 322-7311
known)	E-mail Address (if	
Defendant No. 2		
Name		NEIL E. JAMERSON
known)	Job or Title (if	ASSOCIATE DEAN FOR COMMUNITY STANDARDS & STUDENT SUPPORT
Street Address		RAND HALL, 2302 VANDERBILT PLACE, SUITE 310
City and County		NASHVILLE
State and Zip Code		TN. 37240
Telephone Number		(615) 219-9596
known)	E-mail Address (if	
Defendant No. 3		
Name		JOHN DOE & JANE DOE
known)	Job or Title (if	UNKNOWN, being employees of defendant No. 1
Street Address		UNKNOWN
City and County		Unknown
State and Zip Code		Unknown
Telephone Number		Unknown
known)	E-mail Address (if	
Defendant No. 4		
Name		
known)	Job or Title (if	
Street Address		
City and County		
State and Zip Code		
Telephone Number		
known)	E-mail Address (if	
<b>II. Basis for Jurisdiction</b>  Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.		

What is the basis for federal court jurisdiction? (check all that apply)

Federal  
question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Americans With Disabilities Act, Fourteenth Amendment and Fifth Amendment of the United States Constitution (Equal Protection Clause and Due Process Clause)

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

1. The Plaintiff(s)

a. If the plaintiff is an individual

plaintiff, (name)	The	Temisan Grace Ekperigin	, is a citizen of the
(name)	State of	Connecticut	.

b. If the plaintiff is a corporation

plaintiff, (name)	The		, is incorporated
	under the laws of the State of (name)		,
	and has its principal place of business in the State of (name)		.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

	The defendant, (name)		, is a citizen of
(name)	the State of		. Or is a citizen of
(foreign nation)	(foreign		.

b. If the defendant is a corporation

	The defendant, (name)	Vanderbilt University	, is incorporated under
(name)	the laws of the State of	Tennessee	, and has its
(name)	principal place of business in the State of	Tennessee	.
(foreign nation)	Or is incorporated under the laws of		,
(name)	and has its principal place of business in	Tennessee	.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (explain):



OPPORTUNITY WHICH WILL BE SUFFERED BY PLAINTIFF  
EXCEEDS \$75000 IN COMPENSATORY DAMAGES

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

At Vanderbilt University, in the State of Tennessee

B. What date and approximate time did the events giving rise to your claim(s) occur?

Commencing on or about February 1, 2023 - and continuing

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

I am a registered student at Vanderbilt University, the defendant in this case. Defendants and its agents seek to expel and remove me from campus, due to my mental health disability, without due process of law. They are forcing me to go on medical leave against my will. They have also failed to provide me with reasonable accomodation as required by the law.

The defendants just infomed me on February 27, 2024 that I must immediately leave the campus not later than Sunday, March 2, 2024.

I would like to request an EMERGENCY ORDEER to stop thee school from removing me from campus, pending further review of the facts of this matter.

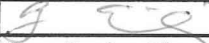
**IV. Irreparable Injury**

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

If the defendants are not immediately restrained by this court, my dismissal from the campus will severely affect my damage my mental health, interrupt and seriously disrupt my academic studies and cause me severe emotional and mental distress. I will not receive academic credit for this semester (which is nearly halfway completed).

**V. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

	An order to restrain the defendant from removing or expelling me from campus or otherwise interfering with my academic studies, participation in campus student activities, and my overall mental wellness, pending further Order of this Court. Damages in such amount as this court deems just, but not less than \$75,000.	
<b>VI. Certification and Closing</b>  Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.  <b>A. For Parties Without an Attorney</b>  I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.		
Date of signing:		02/28/2023
Signature of Plaintiff		
Printed Name of Plaintiff		Grace Temisan Ekperigin
<b>B. For Attorneys</b>  Date of signing:		
Signature of Attorney		
Printed Name of Attorney		
Bar Number		
Name of Law Firm		
Street Address		
State and Zip Code		
Telephone Number		
E-mail Address		

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading) Grace T Ekperigin  
has been served on:

(Name) Vanderbilt University  
(Address) 2301 Vanderbilt Pl  
(Address) Nashville, TN 37232

(Name) Neil E Jamerson  
(Address) 2301 Vanderbilt Pl Suite 310  
(Address) Nashville, TN ~~37232~~ 37232

(Name) \_\_\_\_\_  
(Address) \_\_\_\_\_  
(Address) \_\_\_\_\_

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(Name) \_\_\_\_\_  
(Address) \_\_\_\_\_  
(Address) \_\_\_\_\_

on the 15<sup>th</sup> day of March, 2024.

  
Signature